

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

<p>MARK SAFFELL</p> <p style="text-align: center;"><i>Plaintiff,</i></p> <p style="text-align: center;">vs.</p> <p>TEKSYSTEMS, INC., ET AL.</p> <p style="text-align: center;"><i>Defendants.</i></p>	<p>Case No. 1:21-cv-01393-JG</p> <p>Judge James Gwin</p>
<p>PLAINTIFF’S MOTION FOR EXTENSION OF TIME FOR SERVICE</p>	

Under Fed. R. Civ. P. 4(m), Plaintiff Mark Saffell respectfully requests a 30-day extension of time to complete and file proof of service of process to Defendant Jason Lanciotti. As described below, Plaintiff has good cause for an extension because he has made reasonable efforts to serve Defendants and anticipates that service will be completed very soon.

After filing the Complaint, counsel for Plaintiff reached out to Defendants regarding whether they would waive service under Fed. R. Civ. P. 4(d) and Local Rule 4.2. On September 16, 2021, representatives of TEKsystems, Inc. confirmed that it would not waive service. (Shortly after, on September 18, the undersigned counsel tested positive for Covid-19, followed by others in his household, resulting in his extended absence from his office and delaying service efforts.) On October 6, summonses were issued for the Defendants. Service of process was initially attempted via certified mail. The summons and complaint were delivered to TEKsystems’s registered agent, CSC, on October 8 and to Mr. Lanciotti on October 12—so Defendants have each received notice of this civil action. But to comply with Fed. R. Civ. P. 4(e)(2)(A), Plaintiff moved forward on October 15 with serving Defendant Lanciotti personally via process server. As of this filing, such service has been attempted but not accomplished; it is expected to be completed within the week.

Granting a brief extension of time for service will allow service on Defendant Lanciotti under Fed. R. Civ. P. 4(e)(2)(A). It will not cause undue delay, nor will it prejudice any party.

Respectfully submitted,

/s/ Patrick Haney

Subodh Chandra (OH 0069233)

Patrick Haney (OH 0092333)

THE CHANDRA LAW FIRM LLC

The Chandra Law Building

1265 W. 6th Street, Suite 400

Cleveland, Ohio 44113-1326

216.578.1700 Phone

216.578.1800 Fax

Subodh.Chandra@ChandraLaw.com

Patrick.Haney@ChandraLaw.com

Attorneys for Plaintiff Mark Saffell